

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

(Alexandria Division)

AVILA FLORES, Reyna Isabel

Plaintiff,

v.

RABABEH, Kheder and RABABEH, Imad

Defendants

Civ. No: 1:15-cv-1415-TSE-TCB

**Hearing Date:** March 18, 2016  
10:00 am.**Declaration of Reyna Isabel Avila Flores**

1. I am Reyna Isabel Avila Flores. I am over 21 years of age, am competent to testify, and have personal knowledge of the facts in this declaration.
2. I worked at the Mount of Lebanon Restaurant from about 2011 through August 17, 2015.
3. My principal duties included preparing food, cleaning the restaurant, kitchen maintenance, and dishwashing. There was no set order in which these tasks were to be performed each day.
4. From 2011 through August 17, 2015, I normally worked 12 hours per day, with no break, 6 days per week (Wednesday to Monday) for a total of 72 hours per week. My pay rate was \$650.00 per week. I was always paid in cash.
5. The restaurant kept a ledger of the hours I worked, the wages I was owed, and the wages I was paid. Defendant Imad Rababeh had me look at it and sign it whenever I was paid.
6. Defendant Kheder Rababeh was the person who hired me, who set my work schedule and compensation, who instructed me in my duties on a day-to-day and hour-to-hour basis, who

calculated and paid my wages, and who kept records of the hours that I worked and the wages I was paid. He was typically on site for all or most of each work day.

7. Kheder Rababeh had the power to discipline workers, up to and including firing them. He could also dock our pay. For example, if I had to leave work early due to an emergency, Kheder Rababeh would dock me the entire day's pay—\$110.
8. Defendant Imad Rababeh is Kheder Rababeh's son. He would work at the restaurant about three days each week, either at the till or in the office. On those days when he worked at the restaurant, he would be there the whole day. He was responsible for the accounting for the restaurant, a duty he took over from his mother after she died. I know this because I heard Kheder and Imad talk about it. Imad was also responsible for ordering some of the restaurant's supplies; when we were out of supplies, I would let either Kheder or Imad know about it.
9. I never received overtime pay for any of the hours I worked beyond 40 in a given week.
10. I received no wages at all for my last five weeks of work, other than one single payment of \$265. I do not remember on what specific day or week I received this payment, but I know that it was during those last five weeks. I complained to Kheder Rababeh about my unpaid wages nearly ever day during this time.
11. Finally, on August 17, 2015, I stopped working at Mount of Lebanon. I left at 3 p.m.
12. The attached spreadsheet accurately reflects the hours that I worked and payments I received, to the best of my recollection.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Reyna Isabel Avila Flores

29-2-2016  
Date